

1 Hon. Thomas S. Zilly
2
3
4
5
6
7
8

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 GLENN THOMPSON, JR., and GLENN
10 THOMPSON, SR.,

11 Plaintiffs,

12 vs.

13 ON-SITE MANAGER, INC.,

14 Defendant.

No. 2:15-cv-01596-TSZ

DECLARATION OF COUNSEL
REGARDING MOTION FOR LEAVE
TO AMEND

15 1. My name is Leticia Camacho. I am attorney of record for Plaintiffs in this matter.

16 2. On October 19, 2016—at the end of a deposition conducted by Defendant’s counsel—
Jeffrey Bilanko—at his office, I informed Mr. Bilanko that I would be forwarding Plaintiffs’
First Amended Complaint for his review—pursuant to Fed.R.Civ.P 15(a)(2). In the event that
Defendant did not consent to the First Amended Complaint, I informed Mr. Bilanko that I would
be filing a Motion for Leave to Amend.

21 3. On October 25, 2016, I e-mailed Mr. Bilanko the First Amended Complaint and asked for
22 confirmation of Defendant’s consent or opposition. Subsequently, I e-mailed Mr. Bilanko to set
23 up a conference call for October 27, 2016, to discuss Defendant’s position regarding the First

1 Amended Complaint. Counsel were not able to confer until October 31, 2016, and received a
2 written confirmation on November 1, 2016, that Defendant opposes the First Amended
3 Complaint. See Exhibit 1, attached.

4 4. Attached, as Exhibit 2, is a true and correct copy of a document faxed from the Northwest
5 Justice Project to On-Site Manager, Inc. on August 18, 2015.

6 5. Attached, as Exhibit 3, is a true and correct copy of Mr. Thompson, Sr.'s tenant screening
7 report.

8 6. Attached, as Exhibit 4, is a true and correct copy of Mr. Thompson, Jr.'s tenant screening
9 report.

10 7. Attached, as Exhibit 5, is a true and correct copy of screening report for Mr. Thompson,
11 Sr., produced for Club Palisades by On-Site Manager, Inc.

12 8. Attached, as Exhibit 6, is a true and correct copy of a screening report for Mr. Thompson,
13 Jr., produced for Club Palisades by On-Site Manager, Inc.

14 9. Attached, as Exhibit 7, is a true and correct copy of the transcript of the Deposition of
15 Shannon Dustin.

16 9. Attached, as Exhibit 8, is a true and correct copy of a screening report for Mr. Thompson,
17 Sr., produced for The Lodge by On-Site Manager, Inc.

18 10. Attached, as Exhibit 9, is a true and correct copy of a screening report for Mr. Thompson,
19 Jr., produced for The Lodge by On-Site Manager, Inc.

20 11. Attached, as Exhibit 10, is a true and correct copy of the transcript of the Deposition of
21 Joseph Davidson—On-Site Manager, Inc.'s 30(b)(6) Deposition.

22 12. Attached, as Exhibit 11, is a true and correct copy of letter that I wrote to Nicholas L.
23 Jenkins, attorney of record for Greystar Management—property management company for "The

24

1 Lodge"—regarding the Subpoena Duces Tecum and the scheduled Deposition.

2
3 I DECLARE UNDER PENALTY OF PERJURY, UNDER THE LAWS OF THE STATE OF
4 WASHINGTON, THAT THE FOREGOING IS TRUE AND CORRECT.

5 Signed at Seattle, Washington on November 3, 2016

6 
7 Leticia Camacho, WSBA #31341

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

1 **DECLARATION OF SERVICE**

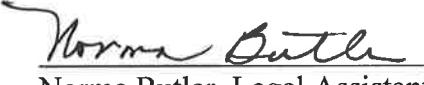
2 I hereby certify that on the 3rd day of November, 2016, I electronically filed the foregoing
3 document to which this declaration is attached with the Clerk of the Court using the CM/ECF
4 system which will send notification of such filing to the following:

5 **COUNSEL FOR DEFENDANT**

6 Jeffrey Bilanko
William Kiendl
Gordon & Rees LLP
701 Fifth Avenue, Suite 2100
7 Seattle, WA 98104
8 jbilanko@gordonrees.com
wkiendl@gordonrees.com

9 and to Stephanie Hosey (shosey@gordonrees.com).

10 Dated this 3rd day of November, 2016.

11 
12 Norma Butler, Legal Assistant